

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
James V. Succi	:	Chapter 7
	:	
Debtor (s)	:	Case No: 19-18051-MDC

MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

James V. Succi, hereinafter referred to as "Debtor" moves this Honorable Court for an Order allowing Debtor's case to be converted from Chapter 7 to Chapter 13 and aver the following:

1. Debtor filed for relief under Chapter 7 of the Bankruptcy code on December 31, 2019.
2. Subsequent to the filing, Debtor's counsel was made aware that Debtor was ineligible for discharge under Chapter 7 due to a prior filing, assigned case number 12-18233-MDC.
3. Notwithstanding the above, Debtor is confident he can propose and complete a Chapter 13 Plan in good faith in order to receive a Bankruptcy Discharge.
4. Debtor shall additionally file a Chapter 13 Plan, and the necessary Amended Schedules to proceed under Chapter 13 of the Bankruptcy Code.

WHEREFORE, the Debtor requests an Order allowing his case to be converted from Chapter 7 to Chapter 13 Bankruptcy.

Dated: January 3, 2020

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107